

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:

BSPV-PLANO, LLC,¹

Debtor.

Chapter 11

Case No. 22-40276 (BTR)

**THE HUNTINGTON NATIONAL BANK'S
WITNESS AND EXHIBIT LIST FOR HEARINGS SCHEDULED FOR
MARCH 8, 2022 AT 10:00 A.M. (PREVAILING CENTRAL TIME)**

The Huntington National Bank, bond trustee (the “**Bond Trustee**”) hereby files this its Witness and Exhibit List for the hearing scheduled on **Tuesday, March 8, 2022 at 10:00 am** on the following matters:

1. *Debtor's Emergency Motion for Interim and Final Authority to Use Cash Collateral* [Docket No. 9] (the “**Cash Collateral Motion**”);
2. *Debtor's Emergency Motion for Interim and Final Approval of Postpetition Financing* [Docket No. 10] (the “**DIP Financing Motion**”);
3. *Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Claims of Critical Vendors and Certain Other Specified Trade Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief* [Docket No. 11] (the “**Critical Vendors Motion**”);
4. *Motion for Entry of an Order (I) Approving the Debtor's Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility*

¹ The last four digits of the Debtor's federal tax identification number is (3228). The Debtor's address for notices is: 4851 Keller Springs Road 209, Addison, Texas 75001.

Companies from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtor's Proposed Procedures for Resolving Additional Assurance Requests, and (IV) Granting Related Relief [Docket No. 12] (the “**Utilities Motion**”);

5. *Debtor's Emergency Motion for Entry of an Order (I) Extending Time to File Schedules and Statements, (II) Authorizing the Debtor to Redact Certain Personal Identification Information, and (III) Granting Related Relief* [Docket No. 13] (the “**Schedules and Statements Motion**”); and

6. *Debtor's Emergency Motion for Entry of an Order (I) Authorizing the Debtor to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief* [Docket No. 14] (the “**Wages Motion**”).

Bond Trustee's Witness List

At the hearing, Bond Trustee may call the following persons to testify as witnesses:

1. David Fields;
2. Any witness called by any other party; and
3. Rebuttal witnesses as necessary.

Bond Trustee reserves the right to cross-examine any witness called by any other party.

Bond Trustee's Exhibit List

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
THNB-A	Trust Indenture			
THNB-B	Notice of Meeting To Discuss Proposed Restructuring of Bonds September 3rd, 2020			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
THNB-C	Updated Proposal to Bridgemoor Bondholders – 2/28/22			
THNB-D	Official Statement			
THNB-E	Loan Agreement			
THNB-F	Call with the Bridgemoor at Plano Bondholders November 19, 2021 Agenda			
THNB-G PART 1	Accompanying email to Forbearance Agreement			
THNB-G PART 2	Forbearance Agreement			
	Any exhibits designated by any other party			
	Any exhibits necessary and appropriate as rebuttal evidence			

Bond Trustee reserves the right to amend or supplement this Witness and Exhibit List as necessary in advance of the Hearing. This Witness and Exhibit List is not intended to limit Bond Trustee at the hearing or to imply that Bond Trustee may not seek introduction of evidence that is not on this list. Bond Trustee reserves the right to use any of the exhibits designated by any other party this case.

Dated: March 8, 2022.

By: /s/ Frances A. Smith

Judith W. Ross

State Bar No. 21010670

Frances A. Smith

State Bar No. 24033084

Eric Soderlund

State Bar No. 24037525

Jessica Lewis

State Bar No. 24060956

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-and-

GREENBERG TRAURIG, LLP

Kevin J. Walsh

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Colleen A. Murphy

(*Pro Hac Vice* Application forthcoming)

MurphyC@gtlaw.com

One International Place, Suite 200

Boston, Massachusetts 02110

Telephone: (617) 310-6000

Facsimile: (617) 310-6001

Counsel for The Huntington National Bank solely in its Capacity as Bond Trustee on behalf of Holders of Certain Bonds

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of March 2022, I caused to be served a true and correct copy of the above and foregoing document via the Court's ECF filing system (without exhibits) and/or U.S. mail (without exhibits)² as indicated in the attached Master Service List.

/s/ Frances A. Smith

Frances A. Smith

² Anyone wishing to receive copies of the exhibits may contact Michael Coulombe by email at michael.coulombe@judithwross.com.

Master Service List
BSPV-Plano, LLC
Case No. 22-40276

Debtor:

BSPV-Plano, LLC
4851 Keller Springs Rd., #209
Addison, TX 75001
Served via U.S. mail

American Arbitration Association
120 Broadway, 21st Fl.
New York, NY 10271
Served via U.S. mail

Debtor's Counsel:

Munsch Hardt Kopf & Harr
Attn: Thomas Daniel Berghman
Davor Rukavina
500 N. Akard, Ste. 3800
Dallas, TX 75201-6659
Phone: 214-855-7554
Fax: 214-978-4346
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drukavina@munsch.com
Served via ECF

Centex Skilled Trades, LLC
1813 Ann and Dossy Ct.
Crowley, TX 76036
Served via U.S. mail

Civil Point Engineers
9101 LBJ Frwy., Ste. 300
Dallas, TX 75243
Served via U.S. mail

Dalworth Framing Corp.
4817 Worth St.
Dallas, TX 75246
Served via U.S. mail

Munsch Hardt Kopf and Harr PC
Attn: Thanh Nguyen
Jay H. Ong
1717 West 6th Street, Suite 250
Austin, TX 78703
Phone: 512-391-6100
Fax: 512-391-6149
Email: anguyen@munsch.com
jong@munsch.com
Served via ECF

JM Lawncare & Sprinkler, LLC
806 Jennifer Ct.
Highland Village, TX 75077
Served via U.S. mail

Landstar Excavation Inc.
P. O. Box 293838
Lewisville, TX 76247
Served via U.S. mail

U.S. Trustee:

Office of the U.S. Trustee
110 N. College Ave., Suite 300
Tyler, TX 75702
Phone: 903-590-1450
Email: ustpregion06.ty.ecf@usdoj.gov
Served via ECF

Miguel Hernandez
1508 Indiana Ct.
Irving, TX 75060
Served via U.S. mail

20 Largest Creditors:

AGES Service Company, Inc.
1080 S. Kimball Ave., Ste. 150
Southlake, TX 76092
Served via U.S. mail

Oldham Lumber Company
8738 Forney Rd.
Dallas, TX 75227
Served via U.S. mail

Paradis Brothers Construction Inc.
450 Cherry Ln.
Southlake, TX 75092
Served via U.S. mail

TXU Energy
P. O. Box 650638
Dallas, TX 75265-0638
Served via U.S. mail

Ranger Fire, Inc.
1000 S. Main St., Ste. 150
Grapevine, TX 76051
Served via U.S. mail

Zais Companies
P. O. Box 1403
Decatur, TX 76234
Served via U.S. mail

Regent Construction
1107 E 1st St.
Fort Worth, TX 76102
Served via U.S. mail

Republic Services #615
551 Huffines Blvd.
Lewisville, TX 75056
Served via U.S. mail

Slates Harwell LLP
1700 Pacific Ave., Ste. 3800
Dallas, TX 75201
Served via U.S. mail

Southwest Enclosure Systems, Inc.
1438 Crescent Dr., #104
Carrollton, TX 75006
Served via U.S. mail

Terry's Portable Welding
106 E. Pioneer
Irving, TX 75061
Served via U.S. mail

Trinia Zais
P. O. Box 1403
Decatur, TX 76234
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Trusted Mechanical Services
7665 Dick Price Rd.
Mansfield, TX 76063
Served via U.S. mail